

**To:** Castanon, David J SPL[David.J.Castanon@usace.army.mil]  
**From:** Brush, Jason  
**Sent:** Wed 6/24/2015 5:51:11 PM  
**Subject:** Decision on "Vigneto" (fna Whetstone)?

Hi Dave - So far, I have 672 emails like the one below, spurred by Sierra Club and Audubon campaigns. Have you decided whether to honor the Whetstone permit that Sallie transferred to El Dorado (new owners) last year, for purposes of fill discharges for the new development proposal Vigneto? Thanks - Jason

Jason A. Brush  
Supervisor, Wetlands Section  
U.S. Environmental Protection Agency, Region 9  
75 Hawthorne Street (WTR-2-4)  
San Francisco, CA 94105

~~~~~  
desk: 415.972.3483  
~~~~~

-----Original Message-----

From: Sierra Club On Behalf Of Dennis Nolan  
Sent: Tuesday, June 23, 2015 10:51 PM  
To: Brush, Jason  
Subject: Villages at Vigneto threatens Arizona

Jun 24, 2015

Mr. Jason Brush  
75 Hawthorne St  
San Francisco, CA 94105

Dear Mr. Brush,

Please revoke the permit for the proposed Villages at Vigneto development in southern Arizona. This mega-development, being proposed by El Dorado Benson, LLC, would threaten the San Pedro River and the wildlife and people who depend on it.

The proposed development would include nearly 28,000 new homes, commercial developments, golf courses, parks, vineyards, orchards, and resorts, as well as an extensive road and utility network. These developments alone would substantially alter the immediate and surrounding area. The potential 70,000 new residents the development is expected to attract would further threaten sensitive resources in the area, including the San Pedro River and wildlife species, and would substantially alter groundwater levels and associated surface flows.

A Clean Water Act Section 404 permit was previously issued to Whetstone Ranch. That permit should be revoked as the Villages at Vigneto is a different development proposal with substantially different and negative potential impacts. As such, it should be revoked pursuant to the Clean Water Act. The Environmental Protection Agency had previously objected to issuance of the 404 permit for Whetstone Ranch, stating that the development may result in substantial and unacceptable impacts to aquatic resources; it can be expected that this new proposal will result in even greater threats.

Impacts to listed species, such as the yellow-billed cuckoo and jaguar, must also be considered relative to this proposed development.

Similarly, effects on migratory birds and other species that depend on this area for resources and for vital movement corridors must be addressed. The San Pedro River and the surrounding area provides

important habitat for a wide diversity of species, and it may not be possible to mitigate potential impacts to these species. A portion of the proposed development is also within a modeled Arizona Wildlife Linkage; as such, it may cut off a critical movement corridor.

The amount of groundwater required for the proposed development far exceeds availability in the area. The required pumping would increase by more than 1100% compared to current pumping levels by the City of Benson. This is unacceptable and ill- advised in an area that receives less than 13 inches of rain per year and has been in a state-declared drought for 16 years. Potential effects of this increased pumping could be devastating.

It is vitally important for you to consider all of this and revoke this permit. Permits should not be authorized unless there are no impacts or if any impacts can be suitably mitigated. Given the extent of the proposed development and its likely effects, such permits should be denied and any current permits revoked.

Thank you for considering my comments.

Sincerely,

Mr. Dennis Nolan

**Ex. 6 - Personal Privacy**